

Burden v CSX  
Affidavit of Don Cooper  
Jan. 9, 1981

Bude

AFFIDAVIT

I, DON COOPER, under oath depose and say:

1. That on or about the evening of January 21, 1980,  
I attended a meeting between Tanja Burden and Allen Allweiss,  
Dennis Quilligan, Lee Fugate from the Office of the State  
Attorney in Pinellas County, Florida, and some other individuals  
at the home of Edd Walters in Las Vegas, Nevada.

2. When the three men from the State Attorney's Office  
first arrived they identified themselves showing us their  
identification and stated they were from the county in which  
the city of Clearwater is located.

3. The entire conversation held at this meeting was tape-  
recorded, by one of the men with the exception of some portions  
of the conversation which occurred during the time when the tapes  
were being replaced.

4. Allweiss stated that it was their purpose to locate  
persons in Las Vegas, Nevada, who would be willing to testify  
about criminal activities of the Church of Scientology against  
its own members.

5. He stated their purpose as that 'we want to kill this  
organisation. We want it to die. We'll reach in and snuff it  
out.' He made similar statements to this effect several times  
during the meeting.

6. Allweiss stated that it was his office's intention to  
keep the media well informed of their actions against the Church,  
with the goal of encouraging other prosecutors around the country  
to bring similar charges against the Church in order to totally  
destroy the Church.

7. Allen Allweiss also stated they had come to Las Vegas  
because they had seen newspaper stories about Michael Flynn's  
suit against the Church in Boston and they got in touch with  
Flynn and told him of their desire to do something about Scien-  
tologists in Clearwater. Allweiss then stated that they got our  
names from Flynn.

8. Mr. Allweiss stated that by invoking a 1977 Florida  
racketeering statute like the one enacted federally in the early  
70's, they wanted to proof that Scientology was carrying on  
illegal activities under this statute.



9. Mr. Allweiss stated that they were informing the newspapers about their investigation. He stated that such publicity would encourage others to launch attacks against the Church.

10. Eddie Walters told Mr. Allweiss that Mr. Flynn asked him to write affidavits for use in getting a warrant for a raid on the Church in Clearwater. He showed it to Mr. Allweiss.

11. Mr. Allweiss expressed an interest to talk to Tanja Burden because she had knowledge about the Church in Clearwater which could be useful to them. In the evening of that day Allweiss questioned Tanja Burden.

12. I have read the Burden complaint and the following things come to my mind in regards to the questions asked by Allweiss that deal with the subject matters of the complaint. Mr. Allweiss asked Burden to briefly state her history in Scientology. When she was talking about being in the Cadet Org Mr. Allweiss asked her whether or not she was prevented from seeing her parents. Her answer was to the effect that there was no problem on seeing her parents.

13. Mr. Allweiss also questioned her about how she left the Church of Scientology in Clearwater and she explained that she "snuck" out because she did not want to go through the "hassles" of the regular procedure of leaving staff. She did not indicate that she was physically restrained from leaving the Church.

14. She also stated that after she had left the Church two people from the Church came to see her and asked her to see L. Ron Hubbard and that, after some debate, decided to do that and willingly went with them to Los Angeles. In her complaint she gives a far different version of this event.

15. The most surprising thing about this interview and interviews of others by men of the State Attorney's Office was the manner of the questioning. The questions were extremely leading frequently suggesting the conclusion sought. For example, Mr. Allweiss questioned one person in the following manner: "Tell me about how they brainwashed you in auditing, how the auditor must have banged on the table and did not let you leave." Or, similarly, "Boy, he must have really brainwashed you, tell me how you couldn't leave, how you were held against



your will. You didn't want to stay, did you? Then they must have held you against your will. That's kidnapping, did you know that? Would you be willing to testify they kidnapped you?"

16. Under penalty of perjury I declare that the foregoing is true and correct.

Don Cooper  
DON COOPER

Subscribed and sworn before me this 9th day of January of the year 1981.

[Signature]  
NOTARY PUBLIC

Notary Public, State of Florida at Large  
My Commission Expires Nov. 7, 1981  
Bonded By American Life & Casualty Company